

Metal Parts and Products (Non-Architectural)

Table I
Identification of Performance Standards
Source Category: Metal Parts and Products (Non-Architectural)

Regulated Component	Pollutant	Rule/Measure/Date									
		Bay Area AQMD 8-19 (12/20/95)		Sacramento Metropolitan AQMD 451 (10/2/97)		Ventura County 74.12 (9/10/96)		San Luis Obispo APCD 411 (1/10/89)		South Coast AQMD 1107 (3/8/96)	
		Performance Standard									
General Coatings	VOC										
Baked		x	275 g/l	x	275 g/l	x	275 g/l	x	275 g/l	x	275 g/l
Air Dried			340 g/l		340 g/l		340 g/l		340 g/l		340 g/l
Pretreatment Wash Primer	VOC										
Baked			420 g/l		780 g/l <u>4/1/98</u> 420 g/l	x	275 g/l		-		420 g/l
Air-Dried			420 g/l		780 g/l 420 g/l		340 g/l				420 g/l
Silicone Release	VOC										
Baked		x	420 g/l		762 g/l <u>4/1/98</u> 420 g/l	x	420 g/l	x	420 g/l	x	420 g/l
Air Dried			420 g/l		762 g/l 420 g/l		420 g/l		420 g/l		420 g/l
Extreme Performance	VOC										
Baked			420 g/l		750 g/l <u>4/1/98</u> 420 g/l	x	360 g/l	x	360 g/l	x	360 g/l
Air Dried			420 g/l		750 g/l 420 g/l		420 g/l		420 g/l		420 g/l
High Temperature	VOC										

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		Performance Standard									
Baked		x	420 g/l		-		420 g/l		720 g/l	x	420 g/l
Air Dried			420 g/l			x	420 g/l		720 g/l		420 g/l
High Performance Architectural	VOC				-						
Baked		x	420 g/l				420 g/l		750 g/l		420 g/l
Air-Dried			420 g/l			x	420 g/l		750 g/l	x	420 g/l
High Gloss	VOC										
Baked		x	360 g/l		x	360 g/l		360 g/l		x	360 g/l
Air-Dried			420 g/l			x	420 g/l		420 g/l	x	420 g/l

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		Performance Standard									
Heat Resistant	VOC										
Baked		x	360 g/l	x	360 g/l	x	360 g/l	x	360 g/l	x	360 g/l
Air-Dried			420 g/l		420 g/l		420 g/l		420 g/l		420 g/l
Metallic Topcoat	VOC										
Baked		x	360 g/l		<u>4/1/98</u> 420 g/l	x	360 g/l	x	360 g/l		420 g/l
Air-Dried			420 g/l		420 g/l		420 g/l		420 g/l		420 g/l
Solar Absorbent	VOC										
Baked		x	360 g/l	x	360 g/l	x	360 g/l	x	360 g/l	x	360 g/l
Air-Dried			420 g/l		420 g/l		420 g/l		420 g/l		420 g/l

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		Performance Standard									
Zinc-Filled Primers	VOC				-				420 g/l		
Baked		-				-		x	420 g/l	-	
Air-Dried											
Non-Skid	VOC		-							-	
Baked				x	360 g/l						
Air-Dried					420 g/l						
Prefabricated Architectural Component	VOC		-								
Baked				x	<u>4/1/98</u> 275 g/l				275 g/l	275 g/l	
Air-Dried					420 g/l			x	420 g/l	x	420 g/l

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		Performance Standard									
Aluminum Coatings for Window Frames and Door Frames Baked Air-Dried	VOC		-			<u>4/1/98 10/1/98</u> 750 g/l 600 g/l 420 g/l x 750 g/l 600 g/l 420 g/l					-
Etching Filler Baked Air-Dried	VOC		-		-		x 420 g/l 420 g/l		720 g/l 720 g/l		x 420 g/l 420 g/l
Vacuum Metalizing Baked Air-Dried	VOC		-		-		x 420 g/l 420 g/l		800 g/l 800 g/l		x 420 g/l 420 g/l

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		Performance Standard									
Mold Seal	VOC		-		-						
Baked						x	420 g/l		750 g/l	x	420 g/l
Air-Dried							420 g/l		750 g/l		420 g/l
Pan Baking	VOC		-		-						
Baked						x	420 g/l			x	420 g/l
Air-Dried							420 g/l				420 g/l
Laboratory Furniture	VOC		-		-						-
Baked						x	340 g/l				
Air-Dried							340 g/l				

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		Performance Standard									
Military Specification	VOC		-		-						
Baked								x	275 g/l	x	275 g/l
Air-Dried									340 g/l		340 g/l
Touch-Up	VOC		-		-						
Baked								x	360 g/l	x	360 g/l
Air-Dried									420 g/l		420 g/l
Camouflage	VOC										
Baked		x	360 g/l	x	360 g/l	x	360 g/l	x	360 g/l		420 g/l
Air-Dried			420 g/l		420 g/l		420 g/l		420 g/l		420 g/l

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		Performance Standard									
Repair	VOC		-		-						
Baked							x	360 g/l	x	360 g/l	
Air-Dried								420 g/l		420 g/l	
Electric Insulating Varnish	VOC		-								
Baked				x	275 g/l			620 g/l		420 g/l	
Air-Dried					340 g/l			620 g/l		420 g/l	
Application Equipment		x	HVLP, electrostatic, detailing gun, or an approved equivalent method	x	roll coat, dipcoat, electrostatic, flowcoat, HVLP, LVLP, brushcoating, roller coating, or a method equivalent to the above	x	electrostatic, flowcoating, HVLP, dip coating, hand application or other method that can demonstrate 65% transfer efficiency	x	electrostatic, flow coat, dip coat, HVLP, or other approved method that can demonstrate 65% transfer efficiency	x	electrostatic, flow coat, dip coat, roll coat, HVLP, hand application, or other method capable of achieving 65% transfer efficiency

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		Performance Standard									
Control Equipment			abatement efficiency of at least 85%		overall efficiency of 85%		capture and control efficiency of 85%		emissions reductions must be equivalent to the use of low VOC coatings	x	control device must reduce emissions by at least 95% by weight, or the output of the control device is 50 ppm by volume calculated as carbon w/no dilution, and the facility demonstrates that the control device collects at least 90% by weight of the emissions generated.
Surface Preparation/Cleanup Solvent					Surface preparation solvents must have a VOC content less than 72 g/l after 10/1/98.	x	Surface preparation solvents must have VOC content of 70 g/l or less.			x	Clean-up solvent must have VOC concentration of 70 g/l or less.
Solvent Evaporative Loss Minimization		x	Closed containers for storage and disposal of solvent soaked rags, and paper. Solvent containers must be closed when not in use.	x	Closed containers for storage and disposal of solvent soaked rags, and paper. Solvent containers must be closed when not in use.	X	Closed containers for storage and disposal of solvent soaked rags, and paper. Solvent containers must be closed when not in use.	X	Closed containers for storage and disposal of solvent soaked rags, and paper. Solvent containers must be closed when not in use.	X	Closed containers for storage and disposal of solvent soaked rags, and paper. Solvent containers must be closed when not in use.

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		Performance Standard									
Recordkeeping		n q	Record coatings and solvents used. Keep weekly records of mixing ratio, amounts of coating and solvents used, speciality coatings, oven temperature, and clean-up and prep solvent used.	n q	List of materials, product information, use of coating and solvents , and control equipment records	n q	Manufacturer of coatings and solvents used, VOC contents, mixing instructions, coating categories used, coating and solvent use records. Monthly records of coating and solvent use and daily use of noncompliant coatings and solvents.	n q	amount and type of coatings and solvent used, VOC content of coating and solvents, application method used	n q	amount of coatings, coating components, solvents, and adhesives used -VOC content of coatings, coating components, solvents, and adhesives used - vapor pressure of solvents
Prohibition of Specification		n q	no person shall require or specify for use or application of a coating if it will result in a violation of the rule.	n q	-	n q	no person shall require or specify for use or application of a coating if it will result in a violation of the rule.	n q	no person shall require or specify for use or application of a coating if it will result in a violation of the rule.	N q	no person shall require or specify for use or application of a coating if it will result in a violation of the rule.

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		Performance Standard									
Compliance Statement		n q	Manufacturer shall provide on container of all coatings and solvents or accompanying MSDS, the VOC content and mixing instructions for the coating or solvent.	n q	Seller must provide coating type, VOC content, and mixing instructions.	n q	Manufacturer of coatings and solvents must provide VOC concentration, mixing instructions, and formulation information, and mixing instructions		-		-
Clean-up Equipment			Facilities shall use clean-up equipment that minimizes evaporative losses.		Enclosed cleaner or solvent with VOC content of less than 72 g/l.		Enclosed parts washer or equivalent approved method. VOC composite partial pressure must be < 45 mm Hg at 20 degrees C for cleanup solvents		Facilities shall use clean-up equipment that minimizes evaporative losses.	X	Facilities must use wipe cleaning, spray bottles, enclosed cleaning devices, or approved clean-up equipment. Solvents must have VOC content of 70 g/l or less
Stripper			-	x	200 g/l					x	200 g/l

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Exemptions	<ul style="list-style-type: none"> - any coating used in amounts less than 20 gal/yr, Facilities using this exemption shall be limited to 100 gal/yr total coating - touch-up operations - aerosol cans - speciality coatings exemption: the rule VOC limits do not apply to the following speciality coatings, provided the VOC contents do not exceed the following, and an exemption application is filed. <p>High Performance Architectural- 750 g/l</p> <p>Pretreatment Wash Primer- 780 g/l</p> <p>Silicone Release- 700 g/l</p> <p>Extreme Performance-750 g/l</p>	<ul style="list-style-type: none"> - VOC limits do not apply if usage is less than 55 gal/yr - VOC limits do not apply for aluminum coating for window frames and door frames in volumes less than 200 gal/yr - VOC limits do not apply for pretreatment wash primer in volumes less than 200 gal/yr 	<ul style="list-style-type: none"> - total usage of noncomplying coatings does not exceed 55 gal/yr - stationary sources emitting less than 200 pounds of VOC per year from coatings, thinners, and any VOC containing product - surface preparation and cleanup requirements do not apply provided that total usage of surface cleaners is less than 5 gal/yr. 	<ul style="list-style-type: none"> - any coating used in volumes less than 20 gal/yr, provided no compliant coatings are available - pretreatment wash primer - stationary source using not more than 4 gal/day of solvent containing materials, and not more than 1 gal/hr, provided that record keeping requirements are satisfied - facilities that use control equipment - the 65% transfer efficiency requirement does not apply to metallic coatings which contain more than 30 grams of metal particles/liter of coating as applied - facilities that cannot meet the 65% transfer efficiency requirement can petition for an exemption from this provision 	<ul style="list-style-type: none"> - a facility using less than 1 gal/day - total noncompliant coating use per facility does not exceed 55 gal/yr - facilities that cannot meet the 65% transfer efficiency requirement can petition for an exemption from this provision - the 65% transfer efficiency requirement does not apply to metallic coatings which contain more than 30 grams of metal particles/liter of coating as applied, touch-up coatings, repair coatings, textured coatings, mold-seal coatings, and to facilities that use less than 3 gal/day of coating. - VOC limitations shall not apply to high performance architectural, vacuum metalizing, and/or pretreatment coatings used at

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	High Temperature - 550 g/l Any person seeking to use these exemptions is limited to 1000 gal/yr use.				a facility which has the potential to emit a total of 10 tons or less per year of VOC, before the applicaiton of controls.
Applicability	coating of any metal part or product, except those products subject to other district rules	The provisions of this rule apply to the coating of miscellaneous metal parts and products including coating removal (stripping), surface preparation and cleanup operations by any person, as defined in the rule.	The provisions of this rule apply to any person who applies or specifies the use of surface coatings to metal parts or products.	Any person who applies or specifies the use of surface coatings to metal parts and products	This rule applies to all metal coatings operations except those performed on aerospace assembly, magnet wire, marine craft, motor vehicle, metal container, and coil coating operations.

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Comments	<p>EPA Control Technology Guidelines for Miscellaneous Metal Parts and Products requires VOC limits of 360 g/l for baked coatings, and 420 g/l for air dried coatings. No exemptions or higher VOC limits are allowed for speciality coatings.</p> <p>Many districts have 360/420 limits for speciality coatings in their rules. However, many of these rules also have exemptions in some speciality coating categories from these limits for facilities that are not major sources. Many of these low VOC coatings are not currently feasible for all sources for economic and technical reasons.</p>				